

**REMARKS**

Claims 2, 3, 5-15 and 18 are pending herein. By this Amendment, claims 4, 16 and 17 have been canceled, and claims 2, 5 and 6 have been amended.

Specifically, claim 2 has been amended to include the contents of canceled claim 4. Claims 5 and 6 have been amended to depend upon claim 2 rather than upon claim 4. Applicant respectfully submits that the amendments herein do not raise new issues. Accordingly, Applicant requests entry of this Amendment.

In the Office Action, claims 2-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,427,638 to Kolbusz et al. ("Kolbusz").

In view of the amendments and remarks herein, Applicant respectfully requests reconsideration and withdrawal of the rejection set forth in the Office Action.

**I. Rejection Under 35 U.S.C. 103(a)**

Claims 2-18 are rejected under §103(a) as being unpatentable over Kolbusz. Applicant respectfully submits that claims 2, 3, 5-15 and 18 would not have been obvious over Kolbusz.

By this Amendment, claim 4 has been canceled and its contents incorporated into claim 2. Thus, claim 2 now recites the presence of

- a baffle plate for partitioning the interior of the processing tank into an upper part and a lower part, the baffle plate being positioned upward of the pipe and the straightening vane; and
- an outlet pipe for drawing the processing liquid below the baffle plate out of a region inside or outside of the straightening vane without mixing the processing liquid below the baffle plate with the processing liquid upward of the baffle plate.

Claim 2 also recites that the processing liquid is stored outside of the inner cylinder.

The processing liquid tank of claim 2 comprises a cylindrical straightening vane between the inner cylinder and a cylindrical wall of the tank. The claim 2 tank stores a processing liquid inside the tank, utilizing substantially the full capacity of the tank. The tank forms a flow passage for the processing liquid by means of the straightening vane and the baffle plate. In

other words, the processing liquid flows along the flow passage within the space where the processing liquid is stored.

In contrast, Kolbusz stores water only in the upper portion (15) of the tank (11) therein. The lower portion (16) of the tank is used for heat exchange. Thus, the Kolbusz tank comprises a space for storing water and a space for heat exchange. The total volume of the Kolbusz tank is inevitably large. The upper portion (15) of the Kolbusz tank does not form a flow passage within the stored water for heat exchange.

On the other hand, Applicant's claimed processing liquid tank advantageously uses substantially the full space within the tank while achieving heat exchange, thereby minimizing the storage space for the processing liquid in the tank.

According to the Office Action, the outer wall (21) of the chamber-interconnecting duct (23) in the Kolbusz tank reads on the instant claims for a cylindrical straightening vane disposed between the outer tank and the inner cylinder. Applicant submits, however, that if the outer wall (21) in the Kolbusz tank corresponds to the cylindrical straightening vane in the instant claims, then the inner wall structure (20) in the Kolbusz tank should correspond to the inner cylinder recited in the instant claims. However, as Applicant noted above, instant claim 2 recites that the processing liquid is stored outside of the inner cylinder. Thus, the inner cylinder in Applicant's claimed tank does not have processing liquid disposed therein. In contrast, the inner wall structure (20) in the Kolbusz tank has pipes and a heating medium disposed therein. Thus, the inner wall structure (20) in the Kolbusz tank does not correspond to the inner cylinder set forth in Applicant's claims.

Furthermore, if outer wall (21) in the Kolbusz tank corresponds to the cylindrical straightening vane of Applicant's claimed tank, then the Kolbusz tank does not have pipes disposed outside of the "cylindrical straightening vane" therein. In contrast, Applicant's claimed tank has a pipe or pipes (i.e., pipes 160a-160c), as well as stored processing liquid, disposed (via the flow passage set forth in claim 2) both inside and outside the cylindrical straightening vane therein.

In addition, Kolbusz does not teach or suggest a tank comprising a cylindrical straightening vane between an inner cylinder and a side wall of the tank and a baffle plate,

wherein the cylindrical straightening vane and the baffle plate form a flow passage for the processing liquid within the space for storing the processing liquid.

Thus, for at least the reasons set forth above, Applicant respectfully submits that claims 2, 3, 5-15 and 18 would not have been obvious over Kolbusz.

## **II. Conclusion**

In view of the amendments and remarks herein, Applicant respectfully requests that the rejection be withdrawn and that claims 2, 3, 5-15 and 18 be allowed.

If any additional fees are due in connection with the filing of this paper, such as fees under 37 C.F.R. §§1.16 or 1.17, please charge the fees to Deposit Account 02-4300; Order No. 033082M170.

Respectfully submitted,  
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Dated: June 4, 2007

MAM/MM/cvj

Enclosures: (1) Petition for Extension of Time  
(2) Notice of Appeal  
(3) Check for the sum of \$1,520